

1 **GEORGE M. RANALLI, ESQ.**
Nevada Bar No. 5748
2 **JASON ANDREW FOWLER, ESQ.**
Nevada Bar No. 8071
3 **VICKI DRISCOLL, ESQ.**
Nevada Bar No. 3939
4 **JAMES F. HOLTZ, ESQ.**
Nevada Bar No. 8119
5 **RANALLI ZANIEL FOWLER & MORAN, LLC**
2400 W. Horizon Ridge Parkway
6 Henderson, Nevada 89052
ranalliservice@ranallllilawyers.com
7 Attorneys for Defendant,
WALGREEN CO.

8
9 **UNITED STATES DISTRICT COURT**
FOR THE DISTRICT OF NEVADA

10 JEREMY AYERS,)
11 Plaintiff,) Case No:
12 vs.) 2:20-cv-02142-KJD-DJA
13 WALGREEN CO. d/b/a WALGREENS;)
DOES I through X; and ROE)
14 CORPORATIONS I through XX,)
inclusive,)
15 Defendants.)
16)

STIPULATION AND ORDER
TO REMAND CASE TO STATE
COURT

17 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff, JEREMY
18 AYERS, and Defendant, WALGREEN CO., by and through their
19 undersigned counsel that Plaintiff's claims in this action be
20 remanded to the Clark County District Court of Nevada, Case No.:
21 A-20-822987-C, as Plaintiff concedes that the matter in
22 controversy does not exceed the sum of \$75,000, exclusive of
23 / / /

interest and costs, pursuant to 28 U.S.C. § 1332, and, thus,
this Court lacks jurisdiction of this matter.

Dated this 10th day of
December, 2020

Dated this 10th day of
December, 2020

BENSON & BINGHAM <i>/s/ Danielle J. Richardson</i> <hr/> DANIELLE J. RICHARDSON, ESQ. Nevada Bar No. 14752 11441 Allerton Park Drive, Ste. 100 Las Vegas, Nevada 89135 Attorney for Plaintiff	RANALLI ZANIEL FOWLER & MORAN, LLC <i>/s/ Vicki Driscoll</i> <hr/> GEORGE M. RANALLI, ESQ. Nevada Bar No. 5748 JASON ANDREW FOWLER, ESQ. Nevada Bar No. 8071 VICKI DRISCOLL, ESQ. Nevada Bar No. 3939 JAMES F. HOLTZ, ESQ. Nevada Bar No. 8119 Attorneys for Defendant, WALGREEN CO.
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ORDER

BASED UPON THE STIPULATION OF THE PARTIES and good cause appearing therefore,

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

1. This Court lacks jurisdiction of this matter as Plaintiff concedes that the matter in controversy does not exceed the sum of \$75,000, exclusive of interest and costs, pursuant to 28 U.S.C. § 1332; and

2. Plaintiff's claims in this action are remanded to the Clark County District Court of Nevada, Case No.: A-20-822987-C.

DATED this ____ day of _____, 2020.

U.S. DISTRICT COURT JUDGE

Respectfully submitted by:
RANALLI ZANIEL FOWLER & MORAN, LLC

/s/ Vicki Driscoll

GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

JASON ANDREW FOWLER, ESQ.

Nevada Bar No. 8071

VICKI DRISCOLL, ESQ.

Nevada Bar No. 3939

JAMES F. HOLTZ, ESQ.

Nevada Bar No. 8119

Attorneys for Defendant,
WALGREEN CO.

Vicki Perez

From: Danielle Richardson <danielle@bensonbingham.com>
Sent: Thursday, December 10, 2020 8:15 AM
To: Amy Sulanke; Vicki Driscoll
Subject: Re: Walgreen Co. adv. Ayers - Authority for Esignature on Stipulations

You do, yes.

Thank you.

On Thu, Dec 10, 2020 at 7:18 AM Vicki Driscoll <vdriscoll@ranallilawyers.com> wrote:

Danielle,

Do I have authority to affix your esignature to the attached Stipulation and Order to Remand Case to State Court, and Stipulation and Order to Exempt for Arbitration and Limit Plaintiff's Damages?

I will first submit the Federal stipulation. Upon receipt of the Order, we will do a Notice of Entry in State Court, and then submit the other Stipulation to state court.

Vicki Driscoll, Esq.

Attorney

Ranalli Zaniel Fowler & Moran, LLC

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